

To: Johnson, Kathleen[Johnson.Kathleen@epa.gov]; Diamond, Jane[Diamond.Jane@epa.gov]; Goforth, Kathleen[Goforth.Kathleen@epa.gov]; Hanf, Lisa[Hanf.Lisa@epa.gov]; Kemmerer, John[KEMMERER.JOHN@EPA.GOV]; Skophammer, Stephanie[SKOPHAMMER.STEPHANIE@EPA.GOV]; Vendlinski, Tim[vendlinski.tim@epa.gov]
From: Foresman, Erin
Sent: Fri 9/19/2014 7:34:02 PM
Subject: RE: my notes/comments re Sacto meeting

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Hi Everyone,

Thank you for this summary Kathleen. I just want to say that I agree with the statement that DWR, ICF, and our federal partners did not identify technical disagreements at this meeting.

I also wanted to note a few things from the technical discussion notes. These are just FYI.

∇ Remodeling EC & other standards -- I don't know what to expect regarding water quality results if the water quality exercise is remodeled to meet the Emmaton standard. Rerunning the numbers may reduce violations because the modelers will tell CALSIM to meet the Emmaton standard at Emmaton instead of at Three Mile Slough. The subsequent DSM2 evaluation will be more precise than CALSIM and that may show that standards are not being met as often as CALSIM shows. Last, but certainly not least, CALSIM has had substantial upgrades and problem fixes since it was run in 2009 to produce the analysis in the DEIS.

∇ X2 – The monthly average X2 numbers were produced and included in the DEIS in Chapter 5 Water Supply (Appendix 5A, Section C.8) but they were not analyzed with respect to compliance with the X2 standard or aquatic life and estuarine habitat. Also they would change if water quality is remodeled.

∇ We want to see how all water quality standards are being met. The standards contained in Table 3 of the WQCP were not evaluated for compliance in the DEIS (spring Delta Outflow Objective, aka spring X2, is one of these standards).

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Schedule: M 7:30a - 4:00p; T - F 7:30a - 2:00p

From: Johnson, Kathleen

Sent: Friday, September 19, 2014 9:37 AM

To: Diamond, Jane; Foresman, Erin; Goforth, Kathleen; Hanf, Lisa; Kemmerer, John; Skophammer, Stephanie; Vendlinski, Tim

Subject: my notes/comments re Sacto meeting

Team,

In terms of the notes from the Sacto meeting. I am less interested in the give and take of what was said and more interested in defining areas of agreement/disagreement and potential action items – particularly with a focus on items we recommended to be included in the Supplemental.

The following is what I heard at the meeting. BTW, Jane and I have a call with Laura King Moon and Maria Rea Thursday of next week. I agreed to this call in lieu of a “principals meeting” which I think premature at this point.

Note, I did not hear anything at the meeting which I would characterize as a technical disagreement e.g. “the data indicates X, no the data indicates Y”. Rather what I heard was more in the vein of Policy or Process, e.g. the modeling didn’t use the current compliance point; the modeling was insufficient; the impacts are uncertain because many parts of the plan are programmatic and therefore vague. Would you all agree with that statement?

EPA’s overarching points from the discussion:

1. In EPA’s view, the DEIS indicates that the alternatives will not improve water quality and will result in more violations of the water quality standards.
2. Preparation and the analysis of the DEIS is occurring even as other processes are evaluating changes to water quality standards (either up or down) and potential changes to compliance points. Nevertheless, EPA’s review of the DEIS will be against existing standards at existing compliance points.
3. Whereas the potential that the project alternative will violate water quality standards seems certain, the mitigation/solutions presented in the DEIS are vague. The Supplement should provide more specificity in terms of the Adaptive Management Plan; Habitat Plan and Flow Plan. Decision trees; trigger points, etc. should be provided.
4. If a preferred alternative is not identified, EPA will rate each alternative. EPA suggests a preferred alternative be identified.

Technical Discussion

1.E/C Salinity

The document modelled the compliance point at Three-Mile Slough. The current compliance point is Emmanton. Based on the modelling (for Three Mile Slough) there are predicted exceedances at Emmanton. (no disagreement on this)

EPA’s evaluation is based on current compliance points.

EPA recommends the Supplement include model runs for current compliance point. TBD if this will be done.

Note: if these runs are done and indicate increased violations (which is our prediction) this will present a problem from an EU rating standpoint.

For X2 – EPA recommends a more detailed analysis for X2 including a year-round monthly analysis of all alternatives. The DEIS contains a detailed analysis but only for Spring and only for H1 – H4. (no disagreement on this)

EPA recommends a more detailed analysis of X2 including monthly averages for every year of the modeling period for every alternative. TBD if this will be done.

Effects analysis doesn't make sense – seems to indicate counterintuitive conclusions. (there did not seem to be a disagreement on this, but project proponent thought the wording could be changed to reflect the analysis better.)

EPA recommends the analysis be redone in such a way that conclusions are supported and explained.

TBD if this will be done.

2 Mercury

EPA is concerned about lack of information in the DEIS on mercury. Project Proponent said some of this info may be in HCP.

EPA recommends that if additional analysis exists in the HCP or other documents, it should be included in the Supplement in order to be evaluated under NEPA. Overall potential impact from Hg is part of the “vagueness” concern about the Habitat Plan. TBD what additional analysis will be done.

3. Selenium – EPA is concerned that potential relative contribution of SJ water to the delta could increase Selenium concern. There seemed to be agreement that this presented a difficult question from a technical analysis/modelling standpoint. This was the only area where I heard an agreement to form a technical committee to try to figure out how to predict potential impact from Se.

Kathleen H. Johnson

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